

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	
DANIEL V. RHOME	:	Case No.: 1:16-05134 (RNO)
TRACEY L. RHOME	:	
Debtors	:	Chapter 13
	:	
AMERICREDIT FINANCIAL SERVICES,	:	Docket No.
INC. dba GM FINANCIAL	:	
Movant	:	11 U.S.C. 362
	:	
vs.	:	
	:	
DANIEL V. RHOME	:	
TRACEY L. RHOME	:	
Respondents/Debtors	:	
	:	
CHARLES J. DEHART, III , ESQUIRE	:	
Trustee	:	

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, come Daniel V. and Tracey L. Rhome (hereinafter “Debtors”), by and through their attorney, the Law Offices of John M. Hyams, and file this Answer to the Motion for Relief from the Automatic Stay, averring as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied.

WHEREFORE, Debtors respectfully request this Honorable Court deny the Creditor’s Motion for Relief from the Automatic Stay and award such further relief as deemed necessary and proper.

Respectfully submitted,

LAW OFFICES OF JOHN M. HYAMS

Dated: September 25, 2017

By: /s/ John M. Hyams
John M. Hyams
555 Gettysburg Pike, Suite C-402
Mechanicsburg, PA 17055
(717) 766-5300
Attorney for Debtors